



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

OFFICE OF
COMPLIANCE AND ENFORCEMENT

FEB 6 2018

Reply To: OCE-101

CERTIFIED MAIL — RETURN RECEIPT REQUESTED

WARNING LETTER

Mr. Steve Lee
North Pacific Seafoods
P.O. Box 99
Naknek, Alaska 99633

Re: North Pacific Seafoods – Pederson Point Facility
Spill Prevention Control and Countermeasure (SPCC) Inspection
Facility Response Plan (FRP) Inspection

Dear Mr. Lee:

On August 2, 2018, a U.S. Environmental Protection Agency (EPA) inspector conducted an SPCC and FRP inspection of your seafood processing facility located in Naknek, Alaska. During the inspection, observations were made indicating the facility had an aggregate aboveground oil storage capacity exceeding 1,320 U.S. gallons. As a result of that inspection, we have determined that your facility may not be in compliance with the SPCC regulations under 40 C.F.R. Part 112 and ask that you take immediate steps to address the following discrepancies:

- The facility was not reviewing and evaluating the SPCC Plan at least once every 5 years. *See* 40 C.F.R. Part 112.5(b); and,
- The facility was not keeping a record of inspections or tests conducted in accordance with written procedures as per general SPCC requirements. *See* 40 C.F.R. Part 112.7(e); and,
- The facility was not training oil-handling personnel to prevent discharges as outlined in the facility SPCC Plan, nor was the facility conducting annual discharge prevention briefings for oil-handling personnel. *See* 40 C.F.R. Part 112.7(f); and,
- The facility was not following the tank integrity regime as outlined in the facility SPCC Plan. *See* 40 C.F.R. Part 112.8(c)(6); and,
- Containers at the facility were not equipped with appropriate liquid level sensing devices, alarms, or Standard Operating Procedures (SOP) per the facility SPCC Plan. *See* 40 C.F.R. 112.8(c)(8); and,

- The facility did not have pipe supports properly designed to minimize abrasion and corrosion and allow for expansion and contraction. *See* 40 C.F.R. 112.8(d)(3).

We ask that you reply by correspondence within thirty (30) days of receipt of this letter, verifying the corrections you have made and implemented. We appreciated your cooperation during the initial site inspection and in maintaining compliance at your facility.

EPA reserves the right to revisit your facility at some time in the future. Any questions regarding this matter should be directed to Kate Spaulding, EPA Region 10 SPCC Compliance Officer, at (206) 553-5429.

Sincerely,



Jeff KenKnight, Manager
Water and Wetlands Enforcement Unit

cc: Mr. Graham Wood
Alaska Department of Environmental Conservation